

Exhibit B

Subject: RE: Abittan v. Temujin et al. (N.D. Cal.)
Date: Monday, November 8, 2021 at 10:51:58 AM Pacific Standard Time
From: Craig Hansen
To: Constantine Economides, Phil Yeager, Collin Greene, Gina Q. Huerta, Stephen C. Holmes
CC: Brianna Pierce
Attachments: image001.png

Constantine:

Thank you for your email of last Friday.

Temujin Cayman will be responding to the Complaint today. Therefore, clerk's entry of default under Rule 55(a) would not be appropriate at this time.

We will provide more information about Temujin Cayman's response by COB today, as requested in your email.

Best,

Craig Alan Hansen



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From: Constantine Economides <ceconomides@rochefreedman.com>
Sent: Friday, November 5, 2021 4:09 PM
To: Craig Hansen <craig@hansenlawfirm.net>; Phil Yeager <phil@hansenlawfirm.net>; Collin Greene <collin@hansenlawfirm.net>; Gina Q. Huerta <gina@hansenlawfirm.net>; Stephen C. Holmes <steve@hansenlawfirm.net>
Cc: Brianna Pierce <bpierce@rochefreedman.com>
Subject: Abittan v. Temujin et al. (N.D. Cal.)

Craig,

We served process on Temujin Cayman, via the Central Authority in the Cayman Islands pursuant to the Hague Service Convention, and we filed proof of that service on September 13, 2021. [ECF No. 81]. On October 6, 2021, Temujin Cayman's previous counsel sought and obtained an extension until October 29, 2021, to respond to the Complaint. [ECF Nos. 91, 92, 93, 95].

We haven't received any communications, requests, or filings on behalf of Temujin Cayman seeking an additional extension. The next requisite step is for Plaintiff to obtain a clerk's entry of default under Rule 55(a). We intend to do so on Monday, November 8, 2021.

If Temujin Cayman would like to provide us with any relevant information, including the reason for failing to respond to the Complaint or any intention to respond to the Complaint, please let us know by COB on November 8.

We reserve all, and do not waive any, rights and arguments arising from Temujin Cayman's failure to respond to the validly served Complaint.

Kind regards,

Constantine P. Economides

Counsel

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